

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

T.C.

Petitioner,

v.

BRIAN A. KYES, United States Marshal,
District of Massachusetts,

Respondent.

Docket No. 24-cv-12458-ADB

**ASSENTED-TO MOTION TO STAY SURRENDER OF T.C. TO TURKEY UNTIL
SEVEN DAYS AFTER A RULING ON AMENDED HABEAS PETITION, DKT. 18**

With the government's assent, Petitioner T.C., through undersigned counsel, respectfully requests that this Honorable Court stay any action to transport or surrender T.C. to Turkey until seven days after a ruling on the issues raised in the pending Amended Petition for Writ of Habeas Corpus (Dkt. 18).

Respectfully Submitted,

T.C., a Juvenile
By his attorneys,

/s/ Martin G. Weinberg
Martin G. Weinberg, Esq.
BBO #519480
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700

/s/ Victoria Kelleher
Victoria Kelleher
Kelleher & Maceo, P.C.
BBO #637908
53 State Street, Suite 500
Boston MA 02109
(978) 744-4126

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.
Mass. Bar No. 690826
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
max@mnpclaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was served on all counsel of record this day, March 10, 2025, and with the United States District Court, District of Massachusetts, 1 Courthouse Way, Boston, 02210.

/s/ Martin G. Weinberg
Martin G. Weinberg, Esq.